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15 *Counsel for Lead Plaintiff Bradley Sostack*

16 *[Additional counsel on signature page]*

17 **UNITED STATES DISTRICT COURT**  
18 **NORTHERN DISTRICT OF CALIFORNIA**  
19 **OAKLAND DIVISION**

20 In re RIPPLE LABS, INC. LITIGATION

21 Case No. 4:18-cv-06753-PJH (RMI)

22 **DISCOVERY MATTER**

23 **CLASS ACTION**

24 **JOINT STIPULATION AND**  
**[PROPOSED] ORDER RE FEDERAL**  
**RULE OF CIVIL PROCEDURE 30(B)(6)**  
**DEPOSITION**

25 This Document Relates to:

26 All Actions

27  
28

1 Lead Plaintiff Bradley Sostack and Defendants Ripple Labs Inc., XRP II, LLC, and Bradley  
 2 Garlinghouse (collectively the “Parties”), by and through undersigned counsel, hereby stipulate to  
 3 the following:

4 1. On February 23, 2022, the Court issued an order modifying the case schedule. Dkt.  
 5 158. Pursuant to this order, non-expert discovery closed on March 31, 2023. *Id.*; *see also* Dkt.  
 6 217 (reaffirming this deadline). Under Northern District of California Civil Local Rule 37-3, “a  
 7 ‘discovery cut-off’ is the date by which all responses to written discovery are due and by which  
 8 all depositions must be concluded.” Depositions may only occur after this date “by order of the  
 9 Court for good cause shown.” *Id.*

10 2. On March 30, 2023, Lead Plaintiff took the deposition of Ripple’s Federal Rule of  
 11 Civil Procedure 30(b)(6) witness.

12 3. During and after the deposition, Lead Plaintiff raised concerns about certain of the  
 13 30(b)(6) witness’s responses. The parties met and conferred about Lead Plaintiff’s concerns on  
 14 April 4–6, 2023.

15 4. Defendants dispute Lead Plaintiff’s concerns but agreed to resolve the dispute by  
 16 reopening the deposition and presenting the 30(b)(6) witness for an additional 30 minutes.

17 5. The Parties therefore stipulate and request that the Court issue an order allowing  
 18 this deposition to take place within 14 days of the filing of the order.

19 6. This order will not affect any dates or deadlines in the scheduling order. *See* Dkt.  
 20 217.

21 IT IS SO STIPULATED.

22 DATED: April 7, 2023

23 By: *s/ Nicholas N. Spear*

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11 *Attorneys for Defendants Ripple Labs Inc.,*  
12 *XRP II, LLC, and Bradley Garlinghouse*

13 **ATTESTATION**

14 Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the  
15 filing of this document has been obtained from the other signatories.

16 DATED: April 7, 2023

17 /s/ Nicholas N. Spear

18 Nicholas N. Spear

19 **[PROPOSED] ORDER**

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 Dated: \_\_\_\_\_, 2023

22 \_\_\_\_\_  
23 The Honorable Phyllis J. Hamilton